

# Fairfax County Republican Committee

RECEIVED  
FEDERAL ELECTION  
COMMISSION MAIL ROOM



Imp 9 2 19 PM '97

4321 Markham Street • Annandale, Virginia 22003 • 703/256-0202

June 6, 1997

Melissa Hurd  
Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, D.C. 20463

Re: October Quarterly Report (7/1/96-9/30/96)

Dear Ms. Hurd:

This will respond to your letter of May 7 and the follow-up letter of May 29. As we discussed by telephone before the second letter was sent, I have been working on responses. At the time we spoke you indicated I would have an additional 15 days from receipt of a follow-up letter to formulate a response.

In accordance with the itemized matters in your letter, I enclose a revised Schedule H4 reflecting the purpose of the listed expenditures. I also enclose a revised detailed summary page, as well as a revised Schedule B.

The \$5,058.59 in disbursements for newspaper with sample ballot was for a piece of literature with news about the Fairfax County Republican Committee that included a sample ballot for the 1996 election. The literature was printed to have a cover page that looked like that of a newspaper, and was distributed solely by volunteers by hand. This was in no way a newspaper advertisement, as we discussed on the phone. This would not be considered an expenditure under the statute, according to what I understood from you, but we disclosed it because the sample ballot was distributed in a Presidential and Congressional election year, and we wished to err, if at all, on the side of disclosing too much information.

I attach a revised Schedule H4 to reflect the purposes of the expenditures listed. I also attach a revised detailed summary page, and a revised Schedule B, amended as you recommended in your letter.

As to limited payments for administrative expenses, we have completed the form in such a way as to reflect only expenditures that could in some way be related to the 1996 election. To the extent that some expenditures could in some way be deemed to be

Ms. Hurd  
June 6, 1997  
Page 2

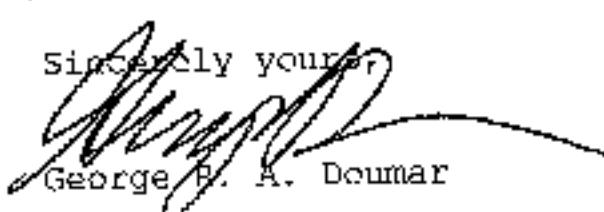
administrative expenses, you state that we should use the ballot composition method for allocating expenses. As our committee has previously stated in prior correspondence to the FEC, dated July 24, 1995, to the extent that the ballot composition method were to be applied, its application would produce a gross distortion of our administrative and operating expenses, would be highly misleading, and be just plain inaccurate.

The primary purpose for which funds in our federal account are used is to pay for printing sample ballots every other year. In 1996 we disclosed expenditures in the federal account that were related to a portion of our fundraising in the fall, from which funds were used to pay for sample ballots, and purchase limited amounts of literature for distribution in the fall campaign, which likely qualified as an exempt expenditure under the FEC rules.

The rest of the County Committee's budget - which is typically less than \$100,000 -- is used entirely to support local activities, and to support state and local candidates. For example, there will be no if any expenditures in 1997 that are remotely in support of any federal candidates. If the County Committee's administrative budget were allocated based on the method described in your regulations, the costs of doing so would be excessive and totally out-of-line with reality. The portion of time of our volunteers devoted to federal activity in any two-year cycle is de minimis. The report as filed reflects a fair and reasonable allocation. To the extent necessary, we request a waiver of the FEC regulations with respect to this item.

Finally, with respect to the four organizations listed in Schedule A about which you inquired, we have confirmed that all four organizations had sufficient funds that were "permissible" under FEC rules to make the contributions. We expect to have documents supporting this fact from each of the organizations shortly. Thus, these contributions were permissible and no corrective action is needed.

If you require any additional information regarding this report, please do not hesitate to contact me at 202-289-1800.

Sincerely yours,  
  
George B. A. Doumar

**DETAILED SUMMARY PAGE**  
**OF RECEIPTS AND DISBURSEMENTS**  
 PAGE 2, FEC FORM 3X

(revised 1/1/91)

NAME OF COMMITTEE <i>Franklin County Republican Committee</i>		REPORT COVERING PERIOD FROM <u>7/1/96</u> TO <u>9/30/96</u>	
		COLUMN A Total Time Period	COLUMN B Calendar Year
<b>I. Receipts</b>			
11.	Contributions (other than loans) From:		
a.	Individuals/Persons Other Than Political Committees		
i.	Identified (use Schedule A)	<u>12,900</u>	<u>12,900</u>
ii.	Unidentified	<u>10,541</u>	<u>11,384</u>
iii.	Total	<u>23,441</u>	<u>24,284</u>
(add i and ii) ▶			
b.	Political Party Committees		
c.	Other Political Committees (such as PACs)		
d.	Total Contributions	<u>3,250</u>	<u>3,250</u>
(add a iii, b and c) ▶		<u>26,691</u>	<u>27,534</u>
12.	Transfers From Affiliated/Other Party Committees		
13.	All Loans Received		
14.	Loan Repayments Received		
15.	Offsets To Operating Expenditures (Refunds, Rebates, etc.)		
16.	Refunds of Contributions Made to Federal Candidates and Other Political Committees		
17.	Other Federal Receipts (Dividends, Interest, etc.)	<u>27.62</u>	<u>27.62</u>
18.	Transfers from Nonfederal Account for Joint Activity		
19.	Total Receipts	<u>26718.62</u>	<u>27561.84</u>
(add 11d, 12, 13, 14, 15, 16, 17, and 18) ▶		<u>26718.62</u>	<u>27561.84</u>
20.	Total Federal Receipts	<u>26718.62</u>	<u>27561.84</u>
<b>II. Disbursements</b>			
21.	Operating Expenditures:		
a.	Shared Federal/Non-Federal Activity (from Schedule H)		
i.	Federal Share	<u>7556.58</u>	<u>7556.58</u>
ii.	Non-Federal Share	<u>1230.16</u>	<u>1230.16</u>
b.	Other Federal Operating Expenditures	<u>8159.75</u>	<u>8236.75</u>
c.	Total Operating Expenditures	<u>16945.49</u>	<u>17223.49</u>
(add a, i, ii, and b) ▶			
22.	Transfers to Affiliated/Other Party Committees		
23.	Contributions to Federal Candidates/Committees and Other Political Committees		
24.	Independent Expenditures (use Schedule E)		
25.	Coordinated Expenditures Made by Party Committees (2 U.S.C. 441e(d)) (use Schedule F)		
26.	Loan Repayments Made		
27.	Loans Made		
28.	Refunds of Contributions To:		
a.	Individuals/Persons Other Than Political Committees		
b.	Political Party Committees		
c.	Other Political Committees (such as PACs)		
d.	Total Contribution Refunds	<u>0</u>	<u>0</u>
(add a, b and c) ▶			
29.	Other Disbursements		
30.	Total Disbursements	<u>16945.49</u>	<u>17223.49</u>
(add 21c, 22, 23, 24, 25, 26, 27, 28d, and 29) ▶		<u>15715.33</u>	<u>15793.33</u>
31.	Total Federal Disbursements	<u>15715.33</u>	<u>15793.33</u>
<b>III. Net Contributions/Operating Expenditures</b>			
32.	Total Contributions (other than loans)(from line 11d)	<u>\$26,691</u>	<u>27,534</u>
33.	Total Contribution Refunds (from line 28d)		
34.	Net Contributions (other than loans)(subtract line 33 from 32)	<u>\$26,691</u>	<u>\$27,534</u>
35.	Total Federal Operating Expenditures	<u>\$15715.33</u>	<u>\$15793.33</u>
(add 21 a i and 21 b) ▶			
36.	Offsets to Operating Expenditures (from line 15)		
37.	Net Operating Expenditures	<u>\$15715.33</u>	<u>\$15793.33</u>
(subtract line 36 from 35) ▶			

## SCHEDULE B

## ITEMIZED DISBURSEMENTS

Use separate schedule(s)  
for each category of the  
Detailed Summary Page

PAGE 2  
OF 2  
FOR LINE NUMBER

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

Fairfax County Republican Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Stewart Mc Knight 3507 Riverwood Rd Alexandria VA 22309	Schoolroom Rental	9/15/96	\$196.00
B. Full Name, Mailing Address and ZIP Code	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
Agua (ool) 7205 Telegraph Rd Sq. Dr. Lorton, VA 22079	Water for volunteers	9/15/96	\$37.52
C. Full Name, Mailing Address and ZIP Code	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
Bell Atlantic P.O. Box 27783 Richmond, VA 23272	phones	9/15/96	\$191.20
D. Full Name, Mailing Address and ZIP Code	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
NATCO 7522 A Fullerton Rd Springfield VA 22153	Copying	9/15/96	\$150.40
E. Full Name, Mailing Address and ZIP Code	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
NATCO 7522A Fullerton Rd Springfield VA 22153	Copying	9/15/96	\$191.71
F. Full Name, Mailing Address and ZIP Code	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
AT&T P.O. Box 598008 Orlando, Fla. 32809	phones	9/15/96	\$111.54
G. Full Name, Mailing Address and ZIP Code	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
Oakton High School 2900 Sutton Rd Vienna, Va.	Schoolroom Rental	9/16/96	\$495.00
H. Full Name, Mailing Address and ZIP Code	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
Domino's Pizza 7129 Columbia Pike Annandale VA	Food	9/17/96	\$79.37
I. Full Name, Mailing Address and ZIP Code	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
Staples 9475 Arlington Blvd. Fairfax, VA 22031	Paper	9/19/96	\$94.71

SUBTOTAL of Disbursements This Page (optional) ..... \$1547.45

TOTAL This Period (last page this line number only) .....

## SCHEDULE B

## ITEMIZED DISBURSEMENTS

Use separate schedule(s)  
for each category of the  
Detailed Summary Page

PAGE 2 OF 2  
FOR LINE NUMBER

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

## NAME OF COMMITTEE (In Full)

Fairfax County Republican Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
U.S. Postal Service Menifield, VA 22116	Postage Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9/20/96	\$419.35
U.S. Postal Service Menifield, VA 22116	Postage Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9/23/96	\$320
Republican Party of Virginia 115 E. Grace St. Richmond, VA 23219	yard signs/stickers Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9/25/96	\$4,660
Patsy Diam, Registrar Fairfax County Court Center 12000 Court Center Parkway Fairfax, VA 22035	Copies of 1992 election results Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9/26/96	\$1.10
Staples 9470 Arlington Blvd. Fairfax, VA 22031	paper Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9/26/96	\$160.95
Republican Party of Va 115 E. Grace St. Richmond, VA 23219	Stationery mail cost Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9/28/96	\$1000
Nettowbank P.O. Box 27025 Richmond, VA 23261	monthly account charge Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	7/22/96 8/22/96 9/24/96	\$15.95 \$13.00 \$20.95
	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
			\$6611.30
			\$8158.75

SUBTOTAL of Disbursements This Page (optional) .....

TOTAL This Period (last page this line number only) .....

## NAME OF COMMITTEE

Fairfax County Republican Committee

A. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Commonwealth Consultants 8321 Old Courthouse Rd. Vienna, VA 22182	convention fee/rep party breakfast	9/1/96	\$1200	\$1032	\$168
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ 8786.75 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
B. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Commonwealth Consultants 8321 Old Courthouse Rd. Vienna VA 22182	6x6 (printing, mailing, postage)/rep party, breakfast	9/1/96	\$1294	\$1112.84	\$181.16
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ 8786.75 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
C. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Kinko's P.O. Box 105522 Atlanta, GA 30348	copying/ rep party/ breakfast	9/15/96	\$124.88	\$107.39	\$17.48
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ 8786.75 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
D. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Executive Pier 10412 Main St. Fairfax, VA 22030	printing/ rep party/ breakfast	9/15/96	\$791.03	\$250.28	\$40.74
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ 8786.75 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
E. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Diane McEntyre 6142 Shiplett Blvd. Burke, VA 22015	Suppliers/ rep party/ breakfast	9/15/96	\$14.04	\$12.07	\$1.96
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ 8786.75 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
F. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Panorama Park Marriott 311 Fairview Park Dr. Full Church VA 22042	hotel/ breakfast/ rep party/ breakfast	9/26/96	\$4850	\$4171	\$679
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ 8786.75 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
SUBTOTAL OF JOINT FEDERAL AND NON-FEDERAL ACTIVITY THIS PAGE			\$7773.95	\$6685.58	\$1088.37
TOTAL THIS PERIOD (last page for each line only) (Fed. share to 21 a 1 and non-Fed. share to 21 a 5) ....					
TOTAL THIS PERIOD FOR THE NON-FEDERAL SHARE (used for line 31 of the detailed authority page)					

## NAME OF COMMITTEE

*Pain Park Country Republican Committee*

A. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Fairview Park Marriott 311 Fairview Park Drive Pitts Church VA 22842	Hotel breakfast/ peppermint breakfast	9/28/96	\$1,012.80	\$871	\$141.79
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT					
EVENT YEAR-TO-DATE: \$ 8786.75					
B. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT					
EVENT YEAR-TO-DATE: \$					
C. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT					
EVENT YEAR-TO-DATE: \$					
D. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT					
EVENT YEAR-TO-DATE: \$					
E. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT					
EVENT YEAR-TO-DATE: \$					
F. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT					
EVENT YEAR-TO-DATE: \$					
SUBTOTAL OF JOINT FEDERAL AND NON-FEDERAL ACTIVITY THIS PAGE			\$1,012.80	\$871	\$141.79
TOTAL THIS PERIOD (last page for each line only)(Fed. share to 21 a i and non-Fed. share to 21 a ii) ...			\$8786.75	\$7956.58	
TOTAL THIS PERIOD FOR THE NON-FEDERAL SHARE (used for line 31 of the detailed summary page) ...					

Federal Election Commission  
**ENVELOPE REPLACEMENT PAGE  
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

<input checked="" type="checkbox"/> Hand Delivered	DATE OF RECEIPT <i>6-9-97</i>
<input type="checkbox"/> First Class Mail	POSTMARKED
<input type="checkbox"/> Registered/Certified Mail	POSTMARKED
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> Received from the House Office of Records and Registration	DATE OF RECEIPT
<input type="checkbox"/> Received from the Senate Office of Public Records	DATE OF RECEIPT
<input type="checkbox"/> Other (Specify):  <i>[Signature]</i>	POSTMARKED  and/or DATE OF RECEIPT  <i>6-10-97</i>
PREPARED	DATE PREPARED